been held not to include a bootblack stand, *Burks* v. *Bosso, supra,* a drug store with a soda fountain, *Cicil* v. *Green, supra,* a cemetery, *People* v. *Forest, etc. Co.* (1913) 258 Ill. 36, 101 N. E. 219, a family hotel, *Alsberg* v. *Lucerne, etc. Co.* (1905) 46 Misc. 617, 92 N. Y. Supp. 851, or a saloon *Kelar* v. *Koerber* (1899) 61 Oh. St. 388, 55 N. E. 1002; (2) "other public places where refreshments are served" which has been held not to include saloons, *Rhone* v. *Loomis, supra,* free booths at pure food shows, *Brown* v. *Bell Co.* (1909) 146 Iowa 89, 123 N. W. 231, or private boarding houses, see *Humburd* v. *Crawford* (1905) 128 Iowa 743, 105 N. W. 330; (3) "other public places of recreation and amusement" within which skating rinks, *People* v. *King* (1888) 110 N. Y. 418, 18 N. E. 245; see *Jones* v. *Broadway Co.* (1908) 136 Wis. 595, 118 N. W. 170, and bowling alleys (part of a pleasure resort), *Johnson* v. *Humphrey, etc. Co.* (1902) 24 Ohio C. C. 135, have been held to fall. If the general phrase appears without a list of specific places, the courts construe as public places only those places impressed with a public interest at common law, *Faulkner* v. *Solazzi* (1907) 79 Conn. 541, 65 Atl. 947, or places operated under a privilege or franchise. *Commonwealth* v. *Sylvester* (1866) 95 Mass. 247; *Bowlin* v. *Lyon* (1885) 67 Iowa 536, 25 N. W. 766.

CONSPIRACY—FRAUDULENT TRANSFER—TORT LIABILITY OF FRAUDULENT TRANSFEREE.—The plaintiff brought a tort action against the defendant, who had received property in pursuance of a fraudulent conspiracy to defeat the plaintiff. *Held,* that the conspiracy being in regard to a particular debt, the plaintiff could recover. *Schwenn* v. *Schwenn* (Wis. 1918) 166 N. W. 171.

The weight of authority is that an unsecured general creditor cannot maintain an action against third persons conspiring with the debtor fraudulently to dispose of the debtor's property. *Security State Bank* v. *Reger* (Okla. 1915) 151 Pac. 1170; *Field* v. *Siegel* (1898) 99 Wis. 605, 75 N. W. 397; *Adler* v. *Fenton* (1860) 65 U. S. 407; see Bump, Fraudulent Conveyances (4th ed.) § 528; but see *Hopkins* v. *Beebe* (1856) 26 Pa. 85. Since such a creditor has no lien upon or interest in the property of his debtor, *Hurwitz* v. *Hurwitz* (1894) 10 Misc. 353, 31 N. Y. Supp. 25; *Austin* v. *Barrows* (1874) 41 Conn. 287, he has lost only a possibility of realization, *Moody* v. *Burton* (1847) 27 Me. 427, *Le Gierse* v. *Kellum* (1886) 66 Tex. 242; Bump, *op. cit.* § 528, and this injury is too remote and speculative. *Klous* v. *Hennessey* (1881) 13 R. I. 332, see *Lamb* v. *Stone* (1831) 28 Mass. 527; *Wellington* v. *Small* (1849) 57 Mass. 145. Nor can the creditor be said to be damaged in law, for he still has his debt, see *Moody* v. *Burton, supra,* and has open to him the privilege of securing judgment and then enforcing any of the remedies of the judgment creditor. *Hall* v. *Eaton* (1853) 25 Vt. 458; *Lamb* v. *Stone, supra*; see *Moody* v. *Burton, supra.* The result of allowing such actions would be to subject the fraudulent transferee to liability for all the debts of his transferor, however large the debts, and however small the value of the property transferred, for the action would be equally available to every creditor. See *Moody* v. *Burton, supra*; *Lamb* v. *Stone, supra.* The court in the principal case recognized the general rule, but made an exception on the ground that here the fraud was in regard to a particular contract. This distinction is justified neither in principle nor on authority. It leads to the absurdity that a conspiracy to defeat a single creditor is more objectionable than one to defeat the entire body of creditors.